

Exhibit D

AGENDA
ITEM
NO. 8.a

LAFCO *of Monterey County*

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KATE McKENNA, AICP
Executive Officer

DATE: December 5, 2005

TO: Chair and Members of the Formation Commission

FROM: Kate McKenna, AICP, Executive Officer

SUBJECT: PRELIMINARY SPHERE OF INFLUENCE EVALUATION FOR THE
CITY OF GREENFIELD (*LAFCO File 05-10*)

RECOMMENDATION:

It is recommended that the Commission receive a presentation on the preliminary Sphere of Influence evaluation, and provide comments regarding the City of Greenfield proposal.

EXECUTIVE OFFICER'S REPORT:

Request

The Local Agency Formation Commission of Monterey County has received a request from the City of Greenfield for a preliminary evaluation of its proposed Sphere of Influence. LAFCO's preliminary Sphere of Influence evaluation program allows LAFCO and other agencies to provide early direction to the City prior to finalizing the City's proposed application, and to determine the nature and extent of a Sphere of Influence update study. Therefore, this evaluation is the first step in a two-part process. The second step will be the City's formal Sphere of Influence update application.

The current preliminary evaluation is beneficial in that it can provide early identification of issues related to a Sphere update and provide guidance to the City in preparing the subsequent Sphere update application, and accelerate that formal process.

Proposal Summary

The City has submitted a "Preliminary Sphere of Influence update application" which presents the proposal for an expanded Sphere of Influence (SOI). (See Exhibits A through D.) It includes three areas. The main growth area includes approximately 1,381 acres beyond the existing SOI. Under this proposal, the City's SOI would be expanded in all directions surrounding the City to support a future city with a population of 27,000. Population projections show this is the

expected population of the City in the year 2025. The main growth area of the proposed SOI would be consistent with the City's General Plan update. An additional area, referred to as the "southern addition" has also been included by the City as part of the proposed SOI. This area covering 214 acres is land beyond the area presented in 2003 and beyond that addressed in the City's General Plan update. A third area, known as the proposed Amaral annexation, covers 130 acres northwest of the city limits.

The City's General Plan update only covers the main growth area. The City has requested that LAFCO only consider an SOI update for the main 1,381 acre area at this time but states they will return to LAFCO shortly for an additional SOI update covering the other two growth areas. Consideration of an SOI update in this fashion would constitute piecemeal approach to planning and decision-making and be contradictory to LAFCO policy. This is a policy issue. For purposes of discussion, all three areas presently being considered by the City for an SOI expansion will be addressed in this report.

Background Information

Greenfield is one of four municipalities in the Salinas Valley south of Salinas. It is located 8 miles south of Soledad and 10 miles north from King City. The City is surrounded by productive agricultural land.

The City presented a draft preliminary SOI update to the Commission in 2003 during its process to update the City General Plan. The size and general location of the expanded SOI is similar to the earlier proposal. The primary focus of the 2003 discussion with LAFCO was on drawing a permanent urban line on the east side of the City. There was not much discussion about other aspects of the City's proposed growth plan.

At the LAFCO Executive Officer's request, the City administrators agreed to resubmit their proposal for preliminary review, adding some areas of growth to the original proposal.

The City has not yet expanded into all of its current SOI. Currently, there are five non-contiguous areas surrounding the City that are available for incorporation without needing to expand the SOI.

The Greenfield City Council adopted its new General Plan which includes a planning area identical to the main growth area, on May 31, 2005. The General Plan addressed several issues that are germane to LAFCO's consideration of updating the SOI. These issues are discussed in below. An Environmental Impact Report (EIR) was prepared for the 2005 General Plan update. The EIR was certified on May 31, 2005. Both the General Plan update and the EIR address the main growth area proposed for annexation. Separate EIRs will be prepared for the "southern addition" and the Amaral annexation area. The preparation and public review schedule for these EIRs is not known at this time. The General Plan would also need to be amended to include the "southern addition" and the Amaral areas.

Proposal

The preliminary SOI proposal requests a total of approximately 1,725 acres of additional territory into the SOI for Greenfield. This includes the following:

- The 1,381 acres included in the main annexation area which surrounds the City;
- The 214 acre "southern addition" area which consists of two areas south of the City which are separated by Highway 101 and a small land area adjoining the highway; and
- The 130 acre Amaral area located between 12th Street and 13th Street west of the City.

The City's description of the main growth area is provided in Exhibit A at the end of this report. A map showing the first two areas along with unincorporated areas of the current SOI is provided as Exhibit B. The Amaral annexation area is described in more detail and shown on Exhibit C. The City's proposed General Plan designations for areas within the existing city limits and proposed SOI are shown on the map labeled Exhibit D, with the exception of the Amaral area. Available mapping information for the Amaral area is limited to that shown on Exhibit C.

About 31% of the proposed main annexation area, north of the current City, would be designated as "Artisan Agricultural Visitor Serving" (AAVS) land use, where development is limited to 5% of a parcel's site area. A portion of this AAVS area also has a residential reserve overlay, allowing it to be changed to a residential land use in the future. Residential uses would cover 30% of the main growth area. Residential uses at estate, low and medium densities are proposed. No high density residential is proposed. Commercial uses would cover about 7% of the main growth area.

The "southern addition" would be reserved for low density residential on the 47 acres on the west side of Highway 101. The 167 acres of the east side of the highway would be reserved for commercial and industrial land uses. According to the City's planning consultant, PMC, earlier plans to designate the 47 acre portion as estate residential (as shown on Exhibit D) have now been revised to low density residential. The Amaral area would contain estate density and low density residential land uses.

According to the General Plan, residential uses in the growth areas would have the density ranges shown on the table below. Medium density can include multi-family dwellings as well as single-family dwellings on 1 acre lots.

GREENFIELD GENERAL PLAN RESIDENTIAL LAND USE DESIGNATIONS PROPOSED FOR THE CITY GROWTH AREAS		
Residential Land Use	Range of Dwellings/Acre	Range of Site Area/Dwelling
Estate Residential	2 d.u./acre	0.5 acre – 15,000 sq.ft./d.u.
Low Density Residential	1–7 d.u./acre	1 acre – 6,223 sq.ft./d.u.
Medium Density Residential	1–15 d.u./acre	1 acre – 2,904 sq. ft./d.u.

Needs Analysis and Environmental Review

According to AMBAG population projections, the City currently has a population of 15,000. This proposal is based on providing housing and employment for a population of about 27,000 in the year 2025. The main growth area could actually support a build-out population of 36,000 if all development was constructed at the highest density, there were no agricultural buffer setbacks or other open spaces and there was minimal land remaining to provide for roadways. As required by law, the EIR was prepared using this assumption for a "worst case analysis". The environmental impacts identified by the EIR are also assumed to occur for a total City population

of 27,000. Naturally, the impacts would not be as severe as for the potentially greatest population of 36,000 persons.

The EIR identified several unavoidable adverse impacts from expanding the City to encompass the main growth area under the recently adopted General Plan. They are:

- *Scenic Resources:* A substantial alteration in scenic resources would occur due to the amount of open space/agricultural land that would be converted to urban uses and the rapid pace at which it would be converted. The overall appearance and character of the area surrounding Greenfield would be significantly altered.
- *Agricultural Resources:* A significant area of important agricultural land (prime land, unique farmland and farmland of Statewide importance) would be permanently lost.
- *Air Quality:* Increased construction would generate substantial exhaust and fugitive dust emissions and additional traffic would generate long-term exhaust emissions all resulting in increased air pollutants beyond that specified in the region's Air Quality Management Plan.
- *Wildlife Habitat:* The irreversible loss of wildlife habitat will result as a cumulatively significant impact when taken together with other wildlife habitat proposed for removal by other land conversion in the area.

While mitigations can be applied to some of these impacts to moderate them, none of these impacts can be mitigated to levels which are insignificant. These unavoidable impacts would be further exacerbated with growth and development in the "southern addition" and Amaral areas.

The EIR also identified significant impacts in the areas of Cultural and Historic Resources, Geology, Hazardous Materials, Hydrology and Water Quality, Noise, Population Growth, Public Services and Facilities, and Traffic and Circulation. Mitigation measures recommended by the EIR can mitigate impacts in these areas to levels of insignificance. Most notable are public services and traffic related impacts. These are discussed below.

The EIR concluded that a "lower intensity alternative" to the proposed General Plan update and SOI expansion was environmentally superior to the project. This alternative would either avoid or reduce the impacts associated with the project, but some impacts would remain. The unavoidable impact of permanent loss of agricultural land would occur under both the project and the "lower intensity alternative". Of course less farmland would be converted under the alternative. A site plan of the "lower intensity alternative" is shown on Exhibit E. As stated above, an EIR or other environmental review document has not been prepared for the "southern addition" nor for the Amaral area.

Agricultural Protection Issues

Exhibit G shows the classifications of farmland that surround the City. Much of the farmland is placed under conservation easement. Prime agricultural land is the dominant type of farmland that would be affected by the proposed growth.

The City recognizes that growth in any direction will result in the conversion of prime agricultural land now in row crop and vineyard production. To reduce the amount of land taken out of agriculture, the City states that the new General Plan designates growth areas with

compact development patterns that include a high amount of medium, high and mixed use densities. However, review of the General Plan land use map (Exhibit D) suggests otherwise. The majority of land shown designated for residential uses in the SOI expansion area is at the estate and low densities. Exhibit F lists the land use acreages within a proposed 1,380 SOI expansion area. Land designated for residential use is 417 acres; of that area over 278 acres (67%) is designated for estate and low residential densities. In addition, 130 acres of the "southern addition" are proposed for estate residential.

While the proposed SOI update would expand the SOI in all directions, the City states that less land at the east side of the City would be annexed since this is considered the most productive of the agricultural lands surrounding the City. However, this statement appears to be contrary to what is shown on the City's prepared SOI map (Exhibit B). The majority of unincorporated land within both the existing and proposed SOIs is located east of Highway 101.

The Executive Officer requests the Commission to comment on the overall growth plan and impacts to farmland. The City is to be commended for drawing a firm line to the east, per the 2003 discussion with LAFCO, and preserving the very best farmland. Lands to the west of the City tend to be rocky and require more intensive practices. It makes sense to encourage long term growth in a westerly direction. The proposed northern sphere boundary, however, would take a significant amount of prime land out of large-scale production. Allowing urbanization to extend as far north and northwest as proposed may not be necessary at this time, as there is ample vacant land in other areas. Development at the City's southern edge should be contingent upon mitigation for farmland loss.

The Monterey County Planning Department, the private County Agricultural and Historic Land Conservancy and LandWatch Monterey County have all expressed concerns over the amount of agricultural land that will be taken out of production with this proposal and the spread of growth along the 101 corridor. County Planning asks how the City will mitigate for the loss of farmland.

Consistent with the Commission's practice to require mitigation for annexation of farmlands into a City, LAFCO should discuss with the City a need to mitigate any farmland removed from production. This mitigation could be in the form of onsite or offsite land conservation easements, non-access buffers to prevent spread into prime farmlands, or some other type of mitigation. Such a mitigation could be designed to require approximately a 2 to 1 ratio based on the suitability of the land being taken from production. For example, perhaps land that is currently under production but not considered prime farmland must dedicate one acre for every acre developed under a conservation easement. Land that is considered prime farmland might be required to contribute two or even three acres for every acre being developed. This recommendation was made previously during the King City and Salinas preliminary SOI reviews. Requiring this form of mitigation is a policy decision that requires discussion by the Commission.

The City's General Plan contains policies that promote the use of agricultural buffer setbacks to minimize land use conflict between agricultural and urban uses. However, these policies do not specify a minimum distance for such setbacks. The City's application states that a 200 foot agricultural buffer setback will be required along the eastern boundary to minimize

urban/agricultural land use conflicts. Lesser buffer setbacks, consisting of roadways or physical separations would be placed at other edges of the City. The lesser buffer setbacks may be satisfactory for the western boundary as that is more or less viewed as a temporary edge. It is likely that LAFCO will encourage longterm growth to the west where the soil quality is less than that to the north, south and east of the City. Also, the City's EIR defends a minimal buffer setback on the western boundary because agricultural land to the west of the City is dominated by vineyards and they require less harvesting and mechanical equipment than row crops, and generally have fewer conflicts with urban uses. This rationale has been accepted by LAFCO in practice, though crop types and agricultural practices can change over time. However, agricultural land and business owners in the northwest vicinity of the City have informally expressed concern to LAFCO staff about the impacts of encroaching urbanization, including noise and odor conflicts and traffic congestion. The proposed Amaral addition is of particular concern.

In lieu of a 200 foot buffer at the north boundary, the City proposes to designate the land at the north as Artisan Agricultural Visitor Serving land use. The minimum parcel size for AVSS land is 5 acres which will result in a very low development density. This type of "alternative buffering" may be considered for AVSS land as long as some greater form of buffering barrier or setback is applied to buildings constructed for human use, especially buildings, like museums, that would have a high volume of visitors. However, staff notes again a concern with the extent of growth proposed north of the City.

The private County Agricultural and Historic Land Conservancy has held discussions with the City regarding the Yanks Museum area (designated for AAVS use) and the western portion of the "southern addition". The organization has received assurances that 50 acres adjoining the 171 acre portion of the "southern addition" will be placed in agricultural conservation easement. A similar easement agreement has been reached for the Yanks Museum area. However, the Conservancy continues to be concerned about agricultural impacts from the remainder of the proposed SOI expansion.

Public Services

The City is updating a Capital Improvement Plan (CIP) for domestic water and sewer services parallel with the General Plan update. The new General Plan requires new development to provide these services or to pay fees that will fund the construction of public service infrastructure.

The City has its own wastewater treatment plant that operates with a 1 million gallon/day (mgd) capacity. The Regional Water Quality Control Board recently approved plans for expansion of the treatment plant to provide for a 2 mgd capacity. General Plan policies require developer financing for wastewater facility improvements and assurance there is enough treatment capacity prior to approval of developments. The County Health Department believes the treatment plant should be upgraded to provide tertiary treated wastewater. The Health Department is concerned that the wastewater holding ponds could overtop the ponds in extreme rainfall events as has occurred in the past. Partially treated wastewater has the potential to contaminate groundwater during such accidental occurrences.

Domestic water for the City is provided by 3 municipal wells. Water is stored at the 1 million gallon capacity Oak Avenue reservoir. Presently, there are 2,550 service connections which generate an average daily demand of 1.6 million gallons. The daily peak consumption is 3.2 mgd. The City's Water Master Plan update was completed in 2004. It estimates that build-out of the new General Plan (proposed main growth area) could increase average consumption to 5.3 mgd and peak consumption to 10.7 mgd. This represents an average daily water consumption which is over 3.30 times greater than the current average consumption. The Master Plan identifies the need to construct 3 new wells to serve this demand. Additional groundwater pumping will affect local groundwater supplies. The EIR discussion of this issue is limited to a single paragraph that discusses cumulative impacts. While the EIR concludes there will be a potentially significant cumulative impact to groundwater resources, no mitigation measures are recommended. A more complete analysis of potential impacts to the local area of the groundwater basin should be presented prior to LAFCO considering expanding the City's SOI.

According to the City and the EIR, build-out of the main growth area will require 23 additional police officers and staff and additional patrol cars. The City is planning to construct a new police station at the corner of Elm and 5th Streets. Fire protection is provided by the Greenfield Rural Fire Protection District. This District employs 3 engineers, a part-time secretary and 20 firefighters who are paid on a per-call basis. Neither the EIR nor the City's SOI application seem to address new staffing or other fire protection needs generated by the increased population in the main growth area.

Transportation Issues

The EIR identifies two impacts pertaining to traffic and circulation and provides mitigation for both impacts. Build-out of the General Plan/main growth area will require significant roadway improvements to accommodate the increased traffic generated by new development. Improvements to several streets will be necessary, a new north-south arterial street will be required and improved Highway 101 interchanges will be necessary to provide an acceptable circulation network. According to the EIR, the Circulation Element of the General Plan provides policies that provide for these improvements. General Plan build-out will also generate a substantial need for additional city-wide parking, new bicycle and pedestrian facilities and increased demands on transit. The EIR states that policies of Circulation Element address these issues, including land use design standards that encourage a more compact urban land use pattern. However, this conclusion has been challenged by some of the commentators on the EIR and the current project. Traffic generated by the proposed "southern addition" and Amaral area will increase traffic levels beyond that discussed in the EIR.

Numerous issues concerning regional transportation have been expressed by the California Department of Transportation (Caltrans), the Transportation Agency of Monterey County (TAMC) and the County Public Works Department. The two non-profit organizations commenting on this project also raise concerns about additional project traffic and the need to solve its impacts. The three public agencies agree the increased volumes of traffic will require substantial improvements to State Highway 101 and other roadways in the area. Caltrans believes impacts to Highway 101 can be best addressed through an MOU with the City that requires preparation of a regional traffic study for each proposed development and incorporating traffic mitigations from the study in the approval conditions for such projects. Mitigations would

include the developer to contribute a fair share mitigation fee to help fund Highway 101 improvements.

TAMC indicates that a regional impact fee should be charged to developers to help finance needed highway improvements. The agency states these fees should be based on the TAMC authored *Nexus for a Regional Development Impact Fee* report. TAMC questions the Circulation Element's ability to provide for future bicycle and pedestrian facilities to reduce local automobile travel. The agency requests LAFCO to review the City's Circulation Element to determine if these policies are adequate. The County Public Works Department supports imposition of the TAMC regional impact fee. This agency points out that in addition to additional traffic discussed in the EIR, the proposed commercial and industrial uses in the "southern addition" will generate additional traffic that will include many large trucks that exacerbate traffic impacts. Public Works also states that the current proposal lacks a phasing plan for development. They are requesting LAFCO require a phasing plan for development that includes how and when associated roadway improvements will be implemented.

One of the comments LandWatch made on the Draft EIR challenges the policies of the City's General Plan to provide meaningful encouragement of bicycle, pedestrian and transit use. According to LandWatch, the General Plan's Land Use Element encourages a more suburban land use pattern using cul-de-sacs rather than a grid street pattern which promotes alternative modes of transportation. Staff has not yet the opportunity to review and analyze this part of the General Plan to make a determination on this issue.

Subsequent Steps

This proposal is a preliminary conceptual proposal intended to generate comments from LAFCO staff, the Commission, and interested agencies and individuals, and to facilitate discussion with City staff and the property owners for preparation of the Sphere of Influence update application. The City is in the process of preparing an application for their SOI update. The main growth area would be consistent with the City's General Plan, but as noted above, the two of its three proposed growth areas are not addressed in either its General Plan update or plans for an SOI update at this time. An Environmental Impact Report (EIR) was prepared for the General Plan during 2005 and was certified by the City on May 31, 2005. The City intends to use that EIR as the CEQA document for the SOI update. However, the EIR does not fully address all the environmental issues resulting from the main growth area. No environmental review has occurred to analyze impacts that could be generated from the other two growth areas. As the southern addition and Amaral additions to the main growth area are actively being considered by the City, it would be advantageous for General Plan and EIR work to be done to include them, so that the eventual formal SOI submittal to LAFCO is comprehensive.

Public Involvement

Numerous agencies and organizations have expressed comments about the proposed SOI. These comments are attached as Exhibit G and summarized below. The summaries provide many of the main points of each comment letter, but they are not intended to replace the more detailed content of the letters.

State and Regional Agencies

- California Department of Transportation (Caltrans) states the projected growth of the City will significantly impact State highways. The agency sent two letters. Their letter in June 2005 states the City should adopt a "fair share" regional transportation fee program to fund needed transportation improvements. Their October 2005 letter asks for an MOU with the City to ensure that a regional traffic study be prepared for each development project within the growth areas. All identified impacts in such studies should be mitigated in conditions of development permit approvals.
- The Transportation Agency for Monterey County (TAMC) wants new development to contribute to a regional impact fee to finance highway improvements that will be needed to serve an increased population. TAMC also wants LAFCO to work with Monterey Salinas Transit to improve transit service between Greenfield and surrounding destinations within the County. TAMC also urges LAFCO to consider whether adequate facilities for bicycle and pedestrian travel are planned in the new growth areas and existing areas of the City than will connect with the growth areas.
- The Monterey Bay Unified Air Pollution Control District wants the City to work with the agency to formulate measures to address the significant reduction in air quality resulting from the proposed growth prior to expansion of the SOI. The level of air contaminants generated by construction and additional traffic will not be consistent with the Air Quality Management Plan for the area.

County Agencies

- The County of Monterey prepared a comprehensive letter which incorporated comments from various County departments. The County expressed concerns regarding the proposed SOI expanding outward in all directions, rather than in a single direction. The County is urging LAFCO to require Greenfield's SOI update to be designed to take less land out of agricultural production and prevent growth from spreading along Highway 101.
- The County Planning and Building Inspection Department believes a financial analysis needs to be prepared that shows the economic effects of removing land engaged in agricultural production when it converts to urban uses. This analysis should discuss if and how lost agricultural jobs will be replaced by new employment opportunities in the expanded city. Alternatives to converting so much agricultural land should be explored, including how the City can mitigate for the loss of productive agricultural land.
- The County Public Works Department is concerned that existing County roads that access new City growth areas will receive additional traffic and requirements for additional maintenance. The Department is recommending the City formulate a phasing plan for its future growth and development which includes a plan for how and when necessary roadway improvements will be implemented. It is also recognized that the commercial and industrial land uses proposed for the "southern addition" area will generate higher volumes of additional traffic, including large truck traffic. Therefore, County roads serving these areas will be heavily impacted. The Department recommends the City use The TAMC Regional Impact Fee to generate funds for regional transportation improvements.
- The County Health Department states the City wastewater treatment plant needs to be upgraded to a tertiary treatment facility. Apparently the treatment holding ponds have overflowed in the past during flood events in the Salinas River. When the partially treated

wastewater flows out of the ponds, there is a potential for groundwater contamination to occur. In addition, the Department believes an analysis should be provided that shows the capacity of health care facility and health professionals to service the growing population of Greenfield.

- The County Parks Department states the City's General Plan provides for a sufficient amount of parkland.

Non-Profit Organizations

- The Monterey County Agricultural and Historical Land Conservancy has made agreements with the City to provide agricultural conservation easements to mitigate for farmland conversion at the Yanks Museum site and the proposed "southern addition". The group would like to negotiate similar arrangements with the City regarding the remaining growth areas. The organization is also very concerned about traffic increase and its resultant impacts to Highway 101.
- LandWatch Monterey County has a long list of concerns which are stated in their October 26 letter and its attachment which contains their comments on the Draft EIR. The October 26 letter states the group's continued concern about the large amount of agricultural land that would be converted to urban uses. The letter points out that one of the reasons so much farmland would be converted is due to the City's decision to designate the majority of residential land in the growth areas for estate and low density residential use rather than medium and high density that would require less land area for development.

Public involvement in the development of the SOI is a critical part of the process. LAFCO staff would intend to provide opportunities for public participation other than the required public hearing(s). This could be in the form of workshops or forums in the community, and will be further defined when the process details and timeline for the SOI update are developed.

Conclusion

Staff supports some increase in the City's SOI; however, the lack of information on various impacts resulting from the growth, as presently proposed, make it unwise to consider any expansion of the SOI until more information is provided. The information that is available shows that growth generated in just one of the three proposed growth areas will result in significant impacts that cannot not be fully mitigated, including the issues of agricultural land and air quality. Staff recommends the Commission direct the City to complete the following actions before making a formal SOI update application:

- The SOI update proposal shall be revised to be a more comprehensive unified SOI update that includes all areas proposed for growth within the next 20 years, to avoid a piece meal approach to SOI expansion.
- A revised proposal should further minimize impacts identified by the EIR as unavoidably adverse by reducing the amount of agricultural land converted to urban uses, planning for a higher proportion of high and medium residential densities, strengthening land use and circulation policies that promote alternative forms of transportation and other means resulting from discussions with the commentors on the preliminary SOI update.

- A Supplemental EIR will need to be prepared that, at minimum, analyzes the following issues:
 - Impacts in all topical areas generated by proposed growth beyond the geographic area discussed in the General Plan update EIR certified on May 31, 2005 (i.e. "southern addition" and Amaral areas, if they are retained);
 - Impacts to fire protection service from the total increased population and growth; and
 - Groundwater impacts from the increased water demand generated by the total proposed increased population and growth.
 - Resolving the differing view points on the ability of General Plan policies to encourage bicycle, pedestrian and transit use.
- Including a new General Plan policy that provides for specific mitigation for agricultural land conversion, such as a 2:1 mitigation which requires 2 acres of prime agricultural land to be placed in permanent agricultural conservation easement for every 1 acre of prime agricultural land converted to urban use and a similar 1:1 mitigation ratio when the converted agricultural land is less than prime land.
- Including a new General Plan policy that provides more specificity for agricultural buffer setbacks.
- Work with Caltrans and TAMC on formulating mitigations and financing for regional traffic impacts resulting from future City growth.
- Work with MBUAPCD on methods to reduce air quality impacts from proposed development.

The Executive Officer appreciates the cooperative spirit of the City in participating in this informal review and dialogue process, and is committed to working closely with the City to address issues in a manner that will enable the City to achieve its objectives.

Respectfully submitted,



Kate McKenna, AICP
Executive Officer

Attachments: Exhibit A – City's Preliminary SOI Update Application Proposal.
Exhibit B – Map of Existing SOI and Proposed SOI (minus Amaral)
Exhibit C – Map of the Proposed Amaral Annexation Area
Exhibit D – General Plan Land Use Designations for Two of the SOI Expansion Areas
Exhibit E – EIR "lower intensity alternative" Site Plan
Exhibit F – Acreages of Proposed Land Uses within the Main Growth Area
Exhibit G – Map of Agricultural Lands Surrounding the City
Exhibit H – Comment Letters from Agencies and Organizations

cc: April Wooden, Community Development Director
Mark McClain, Planning Manager